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10 Attorneys for Plaintiff
11 GEORGE BETAK, an individual

12 GEORGE BETAK, an individual,

13 Plaintiff,

14 v.

15 VALERY MIFTAKHOV, an individual;
16 ELECTRIC MOTOR WERKS, INC., a
17 Delaware corporation; and ENEL X
18 NORTH AMERICA, INC., a Delaware
19 corporation,

20 Defendants.

21 CASE NO. 3:19-cv-02516-JSC

22 **JOINT STIPULATION OF DISMISSAL**
23 **PURSUANT TO F.R.C.P. 41(a)(1)(A)(ii)**

1 IT IS HEREBY STIPULATED by and between Plaintiff George Betak and Defendants
2 Valery Miftakhov, Electric Motor Werks, Inc., and Enel X North America, Inc., that this action is
3 hereby dismissed with prejudice pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil
4 Procedure. Each party shall bear their own fees and costs incurred in connection with this action.

5

6 Dated: October 22, 2020

LTL ATTORNEYS LLP

7 By: s/ Joe Tuffaha

8 Joe Tuffaha
9 Prashanth Chennakesavan

10 Attorneys for Plaintiff George Betak

11 Dated: October 22, 2020

12 SKADDEN, ARPS, SLATE MEAGHER &
13 FLOM, LLP

14 By: s/ Abraham A. Tabaie

15 Abraham A. Tabaie

16 Attorneys for Defendants Enel X North
17 America and Electric Motor Werks, Inc.

18 Dated: October 22, 2020

19 FARELLA BRAUN + MARTEL LLP

20 By: s/ Alex Reese

21 Alex Reese

22 Attorneys for Defendant Valery Miftakhov